

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

		)	
FEDERAL TRADE COMMISSION,		)	
		)	
Plaintiff,		)	
		)	
v.		)	CIVIL ACTION NO. 04-CV-11136-GAO
		)	
DIRECT MARKETING CONCEPTS, INC., et		)	
al.,		)	
		)	
Defendants.		)	
		)	

**JOINT MOTION TO EXTEND TIME FOR THE  
DEFENDANTS TO RESPOND TO PLAINTIFF'S MOTION FOR SUMMARY  
JUDGMENT, AND FOR THE PLAINTIFF TO FILE A REPLY BRIEF**

Plaintiff Federal Trade Commission (“Plaintiff”) and Defendants Direct Marketing Concepts, Inc., ITV Direct, Inc., Donald Barrett and Robert Maihos (“Defendants”) hereby jointly request that the Court extend the deadline to January 27, 2006 for Defendants’ responses to the Plaintiff’s Motion For Summary Judgment, and for Plaintiff to file a reply brief by February 17, 2006. As grounds for this motion, the parties state as follows:

1. On December 15, 2005, the Plaintiff filed a Motion for Summary Judgment.
2. Currently Defendants' response is due on January 5, 2006.
3. As a result of the complex issues raised in the Plaintiff's motion, and due to its length of more than sixty pages, the Defendants require additional time to respond to the Plaintiff's Motion.
4. This extension will likewise require extending the time for the Plaintiff to file a reply brief.

WHEREFORE, the parties jointly request that the Court extend the deadline for all Defendants to oppose the Plaintiff's Motion for Summary Judgment to January 27, 2006, and allow Plaintiff to file a reply brief on or before February 17, 2006.

Respectfully submitted,

ATTORNEYS FOR PLAINTIFF,

DIRECT MARKETING CONCEPTS, INC., ITV  
DIRECT, INC., AND DONALD W. BARRETT

By their attorney(s),

/s/ Edward Glennon

Heather Hipsley  
Kial S. Young (BBO # 633515)  
Edward Glennon  
Shira D. Modell  
Federal Trade Commission  
600 Pennsylvania Avenue, N.W.  
Mail Drop NJ-3212  
Washington, DC 20580  
Telephone: (202) 326-3285/3126/3116  
Telecopier: (202) 326-3259

/s/ Christopher Robertson

Peter S. Brooks, BBO #058980  
Christopher F. Robertson, BBO #642094  
Susan W. Gelwick, BBO #567115  
SEYFARTH SHAW LLP  
Two Seaport Lane, Suite 300  
Boston, MA 02210-2028  
Telephone: (617) 946-4800  
Telecopier: (617) 946-4801

Dated: December 22, 2005

CERTIFICATION PURSUANT TO LOCAL RULE 7.1

I, Christopher Robertson, Esquire, hereby certify that I conferred with counsel for Plaintiff, Edward B. Glennon, Esquire, concerning the issues raised in this motion and that the parties have agreed to file the instant motion jointly.

/s/ Christopher Robertson

Christopher Robertson